

ALLEN & OVERY LLP
Todd S. Fishman
1221 Avenue of the Americas
New York, New York 10020
(212) 610-6300
todd.fishman@newyork.allenovery.com

*Attorneys for Defendant
Marfin Popular Bank Public Co Ltd*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----X
: No. 09-CV-00968 (JAP)
JOSEPH P. LASALA and :
FRED S. ZEIDMAN, as CO-TRUSTEES : Honorable Joel A. Pisano
of the AREMISSOFT CORPORATION : United States District Judge
LIQUIDATING TRUST, :
: Oral Argument Requested
Plaintiffs, :
v. : **DEFENDANT'S NOTICE**
: **OF MOTION TO DISMISS**
MARFIN POPULAR BANK PUBLIC :
COMPANY, LTD., : Electronically Filed
:
Defendant. :
:
-----X

TO: Hal M. Hirsch
David Jay
GREENBERG TRAURIG, LLP
200 Park Avenue
Florham Park, New Jersey 07932
Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on July 6, 2009, at 11:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for defendant shall move before the Honorable Joel A. Pisano at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an order pursuant to Rules 8(a), 9(b), 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure and on grounds of forum non conveniens dismissing the complaint with prejudice and granting such other and further relief as the Court deems just and proper.

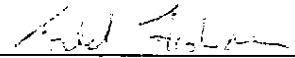
PLEASE TAKE FURTHER NOTICE that to support this motion, defendant shall rely upon the accompany memorandum of law; the Certification of Todd S. Fishman, and the documents appended thereto; the Declaration of Nicos Papaefstathiou, submitted herewith; and the Second Declaration of Stelios Hadjiosif, submitted herewith. A proposed form of Order is also provided.

PLEASE TAKE FURTHER NOTICE that defendant hereby requests oral argument of this motion.

Dated: New York, New York
June 10, 2009

Respectfully submitted,

ALLEN & OVERY LLP

By: 
Todd S. Fishman
1221 Avenue of the Americas
New York, New York 10020
(212) 610-6300

Attorneys for Defendant
Marfin Popular Bank Public Co Ltd